

EXHIBIT 7

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FINJAN, INC., a Delaware Corporation,

Plaintiff,

v.

CISCO SYSTEMS, INC. a California
Corporation,

Defendant.

Case No.: 5:17-cv-00072-BLF-SVK

**[PROPOSED] JOINT PRETRIAL
STATEMENT AND ORDER**

Date: April 30, 2020
Time: 1:30 pm
Place: Courtroom 3, 5th Floor
Judge: Hon. Beth Labson Freeman

FISH & RICHARDSON P.C.

Dated: April 16, 2020

By: /s/ Frank J. Albert

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APPENDIX C-2

Finjan's Exhibit List

Appendix C-2

Appendix C-2 – Finjan’s Trial Exhibit List

Finjan provides the following list of documents and other items to be offered as exhibits at trial, other than solely for impeachment or rebuttal. Inclusion on this list does not obligate Finjan to offer the exhibit at trial. Finjan reserves the right to object to Cisco’s offering as an exhibit at trial and item listed herein. Finjan reserves the right to offer as an exhibit at trial any item listed on Cisco’s exhibit list. Finjan has included “Sponsoring Witness” and “Purpose” columns, the contents of which are not intended to be exhaustive. Finjan reserves the right to amend the contents of these columns. Finjan reserves the right to use or offer any exhibit with any witness qualified to address it. Finjan reserves the right to amend this list. Inclusion on this list or identification of a particular “purpose” is not an admission as to the document’s admissibility or relevance.

Finjan’s General Response to Cisco’s Objections

The basis for Cisco’s objections is not clear from the information Cisco has thus far provided and thus Cisco has not shown the provided exhibits should be excluded. For those exhibits to which Cisco has objected pursuant to Federal Rule of Evidence 403, Finjan responds that the probative value of such exhibits is not outweighed by any danger of unfair prejudice, confusion of the issues, wasting time, misleading the jury, or needlessly presenting cumulative evidence. For those exhibits to which Cisco has objected as lacking foundation, Finjan responds that this objection is premature. To the extent foundation is necessary, it will lay the requisite foundation for those exhibits at trial through the appropriate witness. For those exhibits to which Cisco has objected as improper expert testimony, Finjan denies that the objected-to exhibits contain expert testimony or that testimony about those exhibits would constitute expert testimony, except to the extent testimony about some such exhibits may be offered by a noticed and qualified expert. For those exhibits that Cisco objects to as hearsay, Finjan responds that to the extent the exhibit is sponsored by an expert, the expert is entitled to rely on such exhibit. For those exhibits to which Cisco objects to as DUPE, Finjan responds that Cisco fails to identify the

alleged duplicate exhibits within Finjan's exhibit list. For those exhibits to which Cisco objects to as EXCL or MSJ, Finjan responds that Cisco fails to explain what court order, parties' stipulation, or parties' NDA are relevant. Finjan denies that the court orders, parties' stipulations, or parties' NDA preclude these exhibits. For those exhibits to which Cisco objects to as EXCL (CN) or EXCL (NC),¹ Finjan responds that Cisco fails to explain what internal code name and court order are relevant. Finjan denies that the any court orders preclude these exhibits. For those exhibits to which Cisco objects to as IE, Finjan denies that the exhibit is improper or not substantive evidence. For those exhibits to which Cisco objects to as PJE, Finjan responds that Cisco fails to identify the alleged duplicate exhibits on Cisco's exhibit list. For those exhibits to which Cisco objects to as MIL, Finjan responds that Cisco fails to identify what potential motions in limine are relevant. Finjan denies that any potential motions in limine preclude these exhibits. For those exhibits to which Cisco objects to as MTN, Finjan responds that Cisco fails to explain what Daubert motions or motions to strike are relevant. Finjan denies that the Daubert motions or motions to strike preclude these exhibits.

For all other objections, Finjan has included specific responses to each exhibit by citing the relevant Federal Rule of Evidence or by using the following codes:

NH – Not Hearsay

Legend for Cisco's Objections to Finjan's Proposed Trial Exhibits

Cisco reserves all rights, including its right to amend, modify, or supplement its objections to Finjan's exhibit list as trial preparation and trial progresses. Cisco further reserves the right to object either in whole or in part to any of Finjan's exhibits to the extent they include Cisco's internal code names in contravention of any of this Court's or Magistrate Judge Van Keulen's orders disallowing Finjan or its experts to rely on such codes names as a part of their analysis or theories. Cisco also reserves the right to object to any exhibit to the extent it should

¹ Cisco's single use of EXCL (NC) appears to be a typographical error. To the extent Cisco intended EXCL (NC) to mean anything other than an "improper reference to internal code name excluded by court order," then Finjan reserves its right to amend its response accordingly.

be excluded or limited by any ruling of the Court, such as the Court's rulings on Cisco's Daubert motion or motions in limine. Cisco further reserves the right to object to the relevance of any of Finjan's exhibits depending on the context surrounding Finjan's proposed use or sponsoring witness of the exhibit. Additionally, Cisco objects to the extent an exhibit is admitted, it may be subject to an appropriate limiting instruction.

Cisco provides the codes below for its objections to exhibits on Finjan's Trial Exhibit List.

Abbreviation	Objection
106	Incomplete document
401, 402	Irrelevant
403	Unfair prejudice, confusing, waste of time
408	Violation of FRE 408
602	Lack of personal knowledge/foundation
701	Improper lay opinion
702	Improper expert opinion
DUPE	Duplicate exhibit within Finjan's exhibit list Cisco's objections as to either duplicate apply to the exhibit that remains on Finjan's exhibit list.
IE	Improper exhibit; not substantive evidence
H	Hearsay
A or AUTH	Authentication
BE	Fails to satisfy best evidence rule
EXCL or MSJ	Excluded by court order, parties' stipulation, or parties' NDA
EXCL (CN)	Improper reference to internal code name excluded by court order

Abbreviation	Objection
MIL	Subject to potential motion in limine
MTN	Subject to pending motion (Daubert, mtn to strike)
PJE	<p>Potential joint exhibit to streamline the case and reduce duplicate exhibits on both lists.</p> <p>Cisco reserves the right to maintain its objections to any document identified as a potential joint exhibit that Finjan seeks to use at trial.</p>

Finjan, Inc. v. Cisco Systems, Inc.
No. 5:17-cv-00072-BLF (N.D. Cal.)
Plaintiff Finjan, Inc.'s Exhibit List

PTX Trial Exh. No.	Bates Range	Description	Date	Deposition Exhibit No.	Sponsoring Witness	Purpose	Cisco's Objections	Plaintiff's Responses to Objections	For Court's Use
226	CISCO-FINJAN-YS_00001621.0001 – 16	Finjan Software – Finjan White Paper – Spyware and Adware – Threats and Countermeasures	12/00/2004	Samet Ex. 12	Layne-Layne-Farrar Samet Hartstein Chinn	Background of Cisco, Willfulness, Background of Finjan, Damages, Validity	PJE, H	NH, 803, 803(6)	
227	CISCO-FINJAN-YS_00002365.0001 – 03	Email from Yoav Samet to Hilton Romanski Re: RE: Finjan FO draft	2/13/2006	Samet Ex. 13	Layne-Layne-Farrar Romanski Samet	Background of Cisco, Willfulness, Background of Finjan, Damages	DUPE, H, 602	NH, 803, 803(6), 602	
228	CISCO-FINJAN-YS_00002345 – 46	Email from Yoav Samet to Richard Palmer et al., Re: FW: Finjan gearing for IP attack	1/16/2006	Samet Ex. 15	Layne-Layne-Farrar Samet Tompkins	Background of Cisco, Willfulness, Background of Finjan, Damages	DUPE, H, 602	NH, 803, 803(6), 602	
229	CISCO-FINJAN-YS_00002347.0001 – 15	Finjan Software Presentation – Intellectual Property – Overview	1/10/2006	Samet Ex. 16	Samet Tompkins Hartstein Chinn	Background of Cisco, Willfulness, Background of Finjan, Damages, Validity	PJE, H, 602	NH, 803, 803(6), 602	
230	CISCO-FINJAN-YS_00001946.0001 – 02 CISCO-FINJAN-YS_00001947.0001 – 16 CISCO-FINJAN-YS_00001948.0001 – 42 CISCO-FINJAN-YS_00001949.0001 – 02	Email from Yoav Samet to Martin De Beer et al., Re: FW: Jungo-Cisco-Finjan (with attachments)	10/27/2005	Samet Ex. 17	Layne-Layne-Farrar Samet	Background of Cisco, Willfulness, Background of Finjan, Damages	H, 602	NH, 803, 803(6), 602	
231	CISCO-FINJAN-YS_2952.0001 – 02	Email from Yoav Samet to Mick Scully et al., Re: Finjan claims IP violation by Webroot	3/15/2007	Samet Ex. 18	Layne-Layne-Farrar Samet	Background of Cisco, Willfulness, Background of Finjan, Damages	H, 602	NH, 803, 803(6), 602	
232	CISCO-FINJAN-YS_00005489.0001 – 43	Cisco Presentation – Finjan Follow-on Investment – CC+EC	2/14/2008	Samet Ex. 19	Layne-Layne-Farrar Samet Valory	Background of Cisco, Willfulness, Background of Finjan, Damages	H, 602	NH, 803, 803(6), 602	
233	CISCO-FINJAN-YS_00003718 – 19	Email from Yoav Samet to Richard Palmer et al., Re: RE: Finjan	1/31/2008	Samet Ex. 20	Layne-Layne-Farrar Samet Valory	Background of Cisco, Willfulness, Background of Finjan, Damages	H, 602	NH, 803, 803(6), 602	
234	CISCO-FINJAN-YS_00004682.0001 – 02	Email from Yoav Samet to Richard Pollastra et al., Re: RE: Finjan	9/11/2009	Samet Ex. 21	Layne-Layne-Farrar Samet	Background of Cisco, Willfulness, Background of Finjan, Damages	H, 602	NH, 803, 803(6), 602	
235	CISCO-FINJAN-YS_00004683.0001	Email from Yoav Samet to Paul Glaser Re: Finjan - Additional slides	9/10/2009	Samet Ex. 22	Layne-Layne-Farrar Samet	Background of Cisco, Willfulness, Background of Finjan, Damages	PJE, H, 602	NH, 803, 803(6), 602	
236	CISCO-FINJAN-YS_00004684.0001 – 14	Finjan Presentation – FCS - Finjan Cloud Security Overview	00/00/0000	Samet Ex. 23	Layne-Layne-Farrar Samet Hartstein Chinn	Background of Cisco, Willfulness, Background of Finjan, Damages	H	NH, 803, 803(6)	
237	CISCO-FINJAN-YS_00004713 – 16	Email from Yoav Samet to Keith Valory Re: RE: Call re-Finjan Patents	9/14/2009	Samet Ex. 24	Layne-Layne-Farrar Samet Valory	Background of Cisco, Willfulness, Background of Finjan, Damages	DUPE, H, 602	NH, 803, 803(6), 602	
238	CISCO-FINJAN-YS_00002256.001 – 02	Email from Asher Polani to Neil Cohen et al., Re: RE: Yahoo! Finance Story - Aladdin Granted Important U.S. Patent for Proactive Protection Against Spyware and Viruses: Financial	4/11/2006	Samet Ex. 25	Tompkins Samet Hartstein Chinn	Background of Cisco, Willfulness, Background of Finjan, Damages	DUPE, PJE, H, 602	NH, 803, 803(6), 602	

Finjan, Inc. v. Cisco Systems, Inc.
No. 5:17-cv-00072-BLF (N.D. Cal.)
Plaintiff Finjan, Inc.'s Exhibit List

PTX Trial Exh. No.	Bates Range	Description	Date	Deposition Exhibit No.	Sponsoring Witness	Purpose	Cisco's Objections	Plaintiff's Responses to Objections	For Court's Use
239	CISCO-FINJAN-YS_00002500.001 – 09	Email from Asher Polani to Yoav Samet et al., Re: RE: Finjan Monthly Status Report – (July 31st 2006) - Confidential	8/8/2006	Samet Ex. 26	Layne-Layne-Farrar Tompkins Samet Hartstein	Background of Cisco, Willfulness, Background of Finjan, Damages, Validity	DUPE, PJE, H, 602	NH, 803, 803(6), 602	
240	CISCO-FINJAN-YS_00000484.001	Email from Bailey Szeto to John Stewart et al., Re: RE: Finjan ... (watermarking)	4/5/2004	Samet Ex. 27	Samet Szeto Layne-Farrar	Background of Cisco, Willfulness, Background of Finjan, Damages	DUPE, PJE, H, 602	NH, 803, 803(6), 602	
241	CISCO-FINJAN-YS_00007027.001 – 02	Email from Keith Valory to Yoav Samet Re: FW: Finjan status	9/8/2008	Samet Ex. 28	Samet Valory Layne-Farrar	Background of Cisco, Willfulness, Background of Finjan, Damages	PJE, H, 602	NH, 803, 803(6), 602	
242	CISCO-FINJAN-YS_00004621.001	Email from Yuval Ben-Itzhak to Daniel Quinlan et al., Re: RE: test methodology and data set - private	9/25/2009	Samet Ex. 29	Cole Layne-Layne-Farrar Medvidovic Mitzenmacher Samet Ben-Itzhak Hartstein	Infringement, Background of Cisco/Finjan, Willfulness, Damages, Validity	DUPE, PJE, H, 602	NH, 803, 803(6), 602	
243	CISCO-FINJAN-YS_00004962.001 – 04	Email from Daniel Chinn to Yoav Samet et al., Re: RE: Finjan	3/17/2010	Samet Ex. 30	Layne-Layne-Farrar Samet Chinn Hartstein	Background of Cisco, Willfulness, Background of Finjan, Damages, Validity	PJE, H, 602	NH, 803, 803(6), 602	
244		LinkedIn Profile of Bailey Szeto	00/00/0000	Szeto Ex. 1	Szeto	Background of Cisco, Willfulness, Damages			
245	CISCO-FINJAN-YS_00000484.0001 – 02	Email from Bailey Szeto to John Stewart et al., Re: RE: Finjan ... (watermarking)	4/5/2004	Szeto Ex. 2	Samet Szeto	Background of Cisco, Willfulness, Background of Finjan, Damages	DUPE, PJE, H	NH, 803, 803(6)	
246	CISCO-FINJAN-YS_00000699.0001 – 46	Cisco Presentation – Business Development Minority Investment Review-CC – Finjan	2/19/2004	Szeto Ex. 3	Szeto Samet Hartstein Chinn	Background of Cisco, Willfulness, Background of Finjan, Damages, Validity	H	NH, 803, 803(6)	
247	CISCO-FINJAN-YS_00000416.0001 – 03	Email from shlomo to Yoav Samet Re: FW Cisco Update	3/10/2004	Szeto Ex. 4	Szeto Samet Touboul	Background of Cisco, Willfulness, Background of Finjan, Damages, Validity	H, 602	NH, 803, 803(6), 602	
248	CISCO-FINJAN_00000645.0001 – 08	Cisco Document – Outbreak Filters Deep Dive	00/00/0000	Szeto Ex. 5	Cole Mitzenmacher Medvidovic Allena Kenchappa Owens Szeto	Infringement, Background of Cisco, Willfulness	DUPE, PJE		
249		Talos Intelligence Guide – Cisco's Security's Threat Intelligence Organization	00/00/0000	Szeto Ex. 6	Szeto Watchinski	Infringement, Background of Cisco			
250	CISCO-FINJAN_00001062.0001 – 04	Cisco Webpage – Meraki – Advanced Malware Protection for Meraki MX	00/00/0000	Valentic Ex. 1	Cole Medvidovic Mitzenmacher Valentic	Infringement, Background of Cisco, Willfulness	DUPE, PJE		

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601	CISCO-FINJAN-YS_00001359	Email from Shlomo Touboul to Ravi Varanasi et al., Re: RE: Thank you and next step	1/9/2005		Cole; Layne-Farrar; Medvidovic; Milzenmacher; Samet; Hartstein	Damages, Infringement, Background of Cisco/Finjan, Willfulness, Validity	DUPE, PJE, H, 602	NH, 803, 803(6), 602	
602	CISCO-FINJAN-YS_00001788	Email from Michael Eisenberg to Asher Polani et al., Re: RE: Finjan Transition Status – Snap Shot (October 8th 2005) - Confidential	10/8/2005		Cole; Layne-Farrar; Medvidovic; Milzenmacher; Varanasi; Touboul; Hartstein	Damages, Infringement, Background of Cisco/Finjan, Willfulness, Validity	PJE, H, 602	NH, 803, 803(6), 602	
603	CISCO-FINJAN-YS_00001870	Finjan Software Guide – Board Meeting - General	12/1/2005		Layne-Farrar; Samet; Hartstein	Damages, Willfulness, Background of Cisco/Finjan	PJE		
604	CISCO-FINJAN-YS_00001872	Finjan Software Presentation – Board Meeting - General	12/1/2005		Layne-Farrar; Tompkins; Hartstein; Chinn	Damages, Willfulness, Background of Cisco/Finjan	H, 602	NH, 803, 803(6), 602	
605	CISCO-FINJAN-YS_00001878	Email from Asher Polani to Arad Naveh et al., Re: RE: Finjan Transition Status - Snap Shot (Dece.3rd 2005) - Confidential	12/6/2005		Layne-Farrar; Tompkins; Hartstein; Chinn	Damages, Willfulness, Background of Cisco/Finjan	H, 602	NH, 803, 803(6), 602	
606	CISCO-FINJAN-YS_00001986-97	Email from Asher Polani to Arad Naveh et al., Re: RE: Finjan Board 10Jan2006.ppt with attachment	1/10/2006		Layne-Farrar; Tompkins; Samet; Hartstein; Chinn	Damages, Willfulness, Background of Cisco/Finjan	H, 602	NH, 803, 803(6), 602	
607	CISCO-FINJAN-YS_00002001-06	Email from Asher Polani to Arad Naveh et al., Re: RE: Finjan Transition Status – Snap Shot (Jan. 14th 2006) - Confidential with attachments	1/14/2006		Layne-Farrar; Tompkins; Samet; Hartstein; Chinn	Damages, Willfulness, Background of Cisco/Finjan	H, 602	NH, 803, 803(6), 602	
608	CISCO-FINJAN-YS_00002500	Email from Asher Polani to Yoav Samet et al., Re: RE: Finjan Monthly Status Report – (July 31st 2006) - Confidential	8/8/2006		Layne-Farrar; Tompkins; Samet; Hartstein; Chinn	Damages, Willfulness, Background of Cisco/Finjan	DUPE, PJE, H, 602	NH, 803, 803(6), 602	
609	CISCO-FINJAN-YS_00002909	Gartner Document – Introducing the Secure Web Gateway – ID Number: G00146229 – By: Peter Firstbrook, Arabella Hallawell, Lawrence Orans	3/20/2007		Layne-Farrar; Tompkins; Samet; Hartstein; Chinn	Damages, Willfulness, Background of Cisco/Finjan	H, 602	NH, 803, 803(6), 602	
610	CISCO-FINJAN-YS_00003075	Email from Re: Huck Mediation – Attorney-Client Privileged	9/26/2007		Layne-Farrar	Damages	H, 602	NH, 803, 803(6), 602	
611	CISCO-FINJAN-YS_00003330	Finjan Presentation – A quick look on how the market looked in 2006	00/00/0000		Layne-Farrar; Tompkins; Samet; Ben-Itzhak; Chinn; Hartstein	Damages, Willfulness, Background of Cisco/Finjan, Validity			
612	CISCO-FINJAN-YS_00003421 – 25	Email from Keith Valory to Yoav Samet et al., Re: RE: Finjan	2/12/2008		Layne-Farrar	Damages	H, 602	NH, 803, 803(6), 602	
613	CISCO-FINJAN-YS_00003592	Email from Eric Benhamou to Alex Rogers et al., Re: Agenda	3/24/2008		Cole; Layne-Farrar; Milzenmacher; Valory; Samet	Damages, Infringement, Background of Cisco/Finjan, Willfulness;	PJE, H, 602	NH, 803, 803(6), 602	

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1006	CISCO-FINJAN_00081605	Finjan Software Inc. Amended And Restated Investors' Rights Agreement	11/00/2008		Tompkins; Hartstein; Chinn	Willfulness, Background of Cisco/Finjan	H, 602	NH, 803, 803(6), 602	
1007	CISCO-FINJAN-YS_00000107	Email from Tal Slobodkin to Tal Slobodkin et al., Re: Finjan update call - April 16th	4/16/2012		Tompkins; Hartstein; Chinn	Willfulness, Background of Cisco/Finjan	H, 602	NH, 803, 803(6), 602	
1008	CISCO-FINJAN-YS_00001213	Email from Shlomo Touboul to Arad Naveh et al., Re: Mamamia Update	12/14/2004		Layne-Farrar; Tompkins; Samet	Damages, Willfulness, Background of Cisco/Finjan	H, 602	NH, 803, 803(6), 602	
1009	CISCO-FINJAN-YS_00001547	Email from Shlomo Touboul to Michael Eisenberg et al., Re: Mamamia last update and call for urgent action	6/1/2005		Tompkins; Touboul; Hartstein; Chinn	Willfulness, Background of Cisco/Finjan	PJE, H, 602	NH, 803, 803(6), 602	
1010	CISCO-FINJAN-YS_00001680	Email from Asher Polani to Arad Naveh et al., Re: Termination Letters	8/1/2005		Tompkins; Touboul; Samet; Hartstein; Chinn	Willfulness, Background of Cisco/Finjan, Damages, Validity	PJE, H, 602	NH, 803, 803(6), 602	
1011	CISCO-FINJAN-YS_00002008	Email from Jayshree Ullal to Yoav Samet Re: Re: Finjan gearing for IP attack	1/16/2006		Tompkins; Samet; Hartstein; Chinn	Willfulness, Background of Cisco/Finjan	H, 602	NH, 803, 803(6), 602	
1012	CISCO-FINJAN-YS_00002256	Email from Asher Polani to Neil Cohen et al., Re: Re: Yahoo! Finance Story - Aladdin Granted Important U.S. Patent for Proactive Protection Against Spyware and Viruses: Financial News - Yahoo! Finance	4/11/2006		Tompkins; Samet	Willfulness, Background of Cisco/Finjan, Damages	DUPE, PJE, H, 602	NH, 803, 803(6), 602	
1013	CISCO-FINJAN-YS_00002367	Email from Yoav Samet to Jayshree Ullal et al., Re: Re: Finjan	2/14/2006		Tompkins; Samet; Chinn; Hartstein	Willfulness, Background of Cisco/Finjan, Damages	H, 602	NH, 803, 803(6), 602	
1014	CISCO-FINJAN-YS_00005146	Email from Tal Slobodkin to 'tal@cisco.com' et al., Re: Re: Finjan update Jan 6 2013	1/6/2013		Tompkins; Samet	Willfulness, Background of Cisco/Finjan, Damages	H, 602	NH, 803, 803(6), 602	
1015	CISCO-FINJAN-YS_00005461	Cisco Systems, Inc. Mutual Non-Disclosure Agreement between Cisco Systems, Inc. and Finjan Software, Inc.	1/19/2004		Layne-Farrar; Tompkins; Samet	Damages, Willfulness, Background of Cisco/Finjan	DUPE, H, 602	NH, 803, 803(6), 602	
1016	FINJAN-CISCO 003606 - 07	Minutes of a Meeting of the Board of Directors of Finjan Software Inc. May 19, 2005	5/19/2005		Tompkins; Hartstein; Chinn; Touboul	Willfulness, Background of Cisco/Finjan	DUPE, H, 602	NH, 803, 803(6), 602	
1017	FINJAN-CISCO 003616 - 51	Finjan Software Inc. Action by Unanimous Written Consent of the Board of Directors	6/1/2004		Tompkins; Hartstein; Chinn; Touboul	Willfulness, Background of Cisco/Finjan	H, 602	NH, 803, 803(6), 602	
1018	FINJAN-CISCO 024040 - 44	Cisco Systems, Inc. Mutual Non-Disclosure Agreement between Cisco Systems, Inc. and Finjan Software, Inc.	1/19/2004		Tompkins; Hartstein; Chinn; Touboul	Willfulness, Background of Cisco/Finjan, Validity, Damages	DUPE, H, 602, EXCL	NH, 803, 803(6), 602	
1019		Merriam-Webster Dictionary Definition of good faith https://www.merriam-webster.com/dictionary/good faith	3/26/2020		Tompkins; Hartstein; Chinn; Touboul; Samet	Willfulness, Background of Cisco/Finjan; Validity, Damages	401/402, 403, IE, 702	401, 402, 702, 703	
1020		The Delaware Way: Defence to the Business Judgment of Directors Who Act Loyally and Carefully https://coplaw.delaware.gov/delaware-way-business-judgment/	3/26/2020		Tompkins	Willfulness, Background of Cisco/Finjan	401/402, 403, IE, 702	401, 402, 702, 703	

APPENDIX C-3

Defendant's Exhibit List and Finjan's Objections Thereto

Finjan, Inc. v. Cisco Systems, Inc.

Case No. 5:17-cv-00072-BLF

Appendix C-3

DEFENDANT CISCO SYSTEMS, INC.’S EXHIBIT LIST

United States District Court for the Northern District of California
(San Jose Division)

Finjan, Inc. v. Cisco Systems, Inc.

Case No. 5:17-cv-00072-BLF

Trial Date – June 1, 2020

Pursuant to Section II.B.1 of the Court’s Standing Order Re Civil Jury Trials, Defendant Cisco Systems, Inc. (“Cisco”) respectfully submits its Trial Exhibit List, subject to Cisco’s right to modify this list according to the developments in the case, rulings of the Court (including but not limited to rulings upon forthcoming motions in limine), and in response to Finjan’s case in chief. Cisco reserves the right to supplement, amend, or modify its list as the parties meet and confer and the case proceeds toward the pretrial conference and trial; to introduce such other or additional evidence as may be permitted in the discretion of the Court; and to introduce additional evidence for impeachment or rebuttal purposes. Cisco reserves the right to object to the admission of any document included on its exhibit list. Cisco reserves the right to offer at trial any exhibit listed on Finjan’s exhibit list and the right to use metadata from documents on either party’s exhibit list.

Appendix C-3
Plaintiff Finjan, Inc.'s Key of Objections

Objection List	Abbreviation
Hearsay (FRE 801, 802)—The exhibits/testimony are hearsay and do not fall within any hearsay exception.	H
Irrelevant (FRE 401, 402)—The exhibits/testimony are inadmissible without any tendency to make the existence of any fact that is of consequence to the determination of the action more or less probable than it would be without them. Finjan notes this objection is used for the purpose for which Defendant offers the exhibit without waiving the right to use the exhibit or evidence for another purpose.	401, 402
Unfair Prejudice, Confusing, Waste of Time (403) —To the extent that these exhibits/testimony contain any relevant information, they should be excluded because their probative value is substantially outweighed by the danger of unfair prejudice, confusion of issues, or is a mischaracterization of the testimony, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence.	403
Violates FRE 401, 402 and 403	401-403
Lack of Personal Knowledge/Foundation (FRE 602)—Defendant has not identified a witness with personal knowledge to testify regarding these exhibits. The witness does not have personal knowledge to testify about a matter, the proposed testimony is speculation and/or outside the scope of the 30(b)(6) designation.	602
Improper Lay Opinion (FRE 701)—The exhibits/testimony necessarily rely upon the opinion testimony of a lay witness beyond the scope of what is permitted.	701
Improper Expert Opinion / Testimony (FRE 702)	702
Authenticity—These exhibits have not been authenticated within the meaning of FRE 901. The testimony fails to authenticate the deposition exhibit.	901
Best Evidence (FRE 1001-1003)—The exhibits/testimony fail to satisfy the best evidence rule under FRE 1001-1003.	1001-1003
FRE 1006—These exhibits are an improper summary, chart, or calculation.	1006

Objection List		Abbreviation
Privilege (501)		501
Improper Character Evidence (404, 608, 609)		CE
Leading/Waste of Time (611)—The presentation of these exhibits/testimony will result in needless consumption of time and cause witnesses harassment or undue embarrassment. Leading questions should not be used on direct examination of a witness except as may be necessary to develop a witness' testimony.		611
Compound, Vague, Argumentative, Duplicative, Asked and Answered—The presentation of these exhibits/testimony violate FRE 403 and 611.		403, 611
Improper Legal Conclusion (401, 611) or improper evidence of a legal issue decided by the Court		LC
Subject to motion in <i>limine</i> and/or evidentiary dispute raised in the Pretrial Statement		EXC
Not Related—Counter Designation is Not Related to Initial Designations		NR
Documents Not Produced During Discovery or Outside the Scope of Expert Report		NP
Multiple documents are listed as a single exhibit		MD
Incomplete/unintelligible document or testimony		IC
Not Testimony		NT

Appendix C-3

Defendant Cisco Systems, Inc.'s Responses to Plaintiff Finjan, Inc.'s Objections to Cisco's Exhibits

Cisco responds to Finjan's objections as set forth in the below table.

Abbreviation	Response
C	Complete
REL	Relevant, not unfairly prejudicial, confusing, or waste of time
F	Will be used with witness with personal knowledge or 30(b)(6) deponent, or relied upon by expert
LAY	Proper lay testimony, not submitted as expert testimony, not improper character evidence
EXPERT	Proper expert testimony
NH	Not hearsay or qualifies as an exception to hearsay
AUTH	Properly authenticated or subject to stipulation re authentication
PR	Produced during, admitted as an exhibit at a deposition, properly disclosed/provided with an expert report
BEST	Best evidence
SUM	Proper summary or compilation of documents to streamline the presentation of evidence
AVAIL	Produced, publicly available and identified in deposition or expert report, or exchanged
OPP	Subject to opposition to motion in limine
IMPOBJ	Improper objection

Appendix C-3
 Finjan, Inc. v. Cisco Systems, Inc.
 No. 5:17-cv-00072-BLF (N.D. Cal.)
 Defendant Cisco Systems, Inc.'s Exhibit List

Exhibit #	Description	Begin Dates	End Dates	Purpose	Sponsoring Witness	Objections	Response to Objections	Court Use
2399	Email re: negotiations over MSFT license	CISCO-FINJAN-YS_00001547.001	CISCO-FINJAN-YS_00001547.002	Finjan background, operations, technology	Samet, Touboul	H, 611	NH, REL	
2400	Finjan white paper	CISCO-FINJAN-YS_00001619.001	CISCO-FINJAN-YS_00001619.013	Finjan background, operations, technology	Samet, Touboul			
2401	Securing Active Content WP	CISCO-FINJAN-YS_00001620.001	CISCO-FINJAN-YS_00001620.022	Finjan background, operations, technology	Samet, Touboul			
2402	Spyware White Paper	CISCO-FINJAN-YS_00001621.001	CISCO-FINJAN-YS_00001621.016	Finjan background, operations, technology	Samet, Touboul			
2403	Email from Asher Polani (CEO of Finjan) providing update (snapshot)	CISCO-FINJAN-YS_00001666.001	CISCO-FINJAN-YS_00001666.002	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2404	Strengths and weaknesses for Finjan	CISCO-FINJAN-YS_00001667.001	CISCO-FINJAN-YS_00001667.001	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2405	Snapshot of Finjan Progress (7/29/05)	CISCO-FINJAN-YS_00001676.001	CISCO-FINJAN-YS_00001676.002	Finjan background, operations, technology	Samet, Touboul, Chinn, Polani	H, 602, 611	NH, F	
2406	08.01.2005 email from Asher Polani regarding termination letters	CISCO-FINJAN-YS_00001680	CISCO-FINJAN-YS_00001680	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2407	Finjan Organization Snapshot (8/3/05)	CISCO-FINJAN-YS_00001683.001	CISCO-FINJAN-YS_00001683.002	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2408	Finjan Transition Status - Snap Shot (8/12/05)	CISCO-FINJAN-YS_00001694.001	CISCO-FINJAN-YS_00001694.003	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2409	Finjan Brd Part 2 - FINANCIALS; ORGANIZATION; OPERATION & DIRECTIONS 30Aug2005	CISCO-FINJAN-YS_00001719.001	CISCO-FINJAN-YS_00001719.030	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2410	10.08.2005 email from Michael Eisenberg regarding 'Finjan transition status' - snap shot (October 8, 2005)	CISCO-FINJAN-YS_00001788.001	CISCO-FINJAN-YS_00001788.003	Finjan background, operations, technology	Samet, Touboul, Chinn, Ben-Izhak, Polani	H, 602, 611	NH, F	
2411	FinjanTransition Status-SnapShot (November12h2005)-Confidential	CISCO-FINJAN-YS_00001842.001	CISCO-FINJAN-YS_00001842.002	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2412	12.01.2005 Finjan presentation titled "Board Meeting - General"	CISCO-FINJAN-YS_00001870.001	CISCO-FINJAN-YS_00001870.054	Cisco/Finjan relationship, Finjan background, operations and technology	Klausner, Samet, Ben-Izhak, Polani	H, 602, 611, 702	NH, F, LAY	
2413	FW: Jungo-Cisco-Finjan.mht	CISCO-FINJAN-YS_00001946.001	CISCO-FINJAN-YS_00001946.001	Cisco/Finjan relationship, Finjan background, operations and technology	Klausner, Samet, Touboul, Polani	H, 602, 611, 702	NH, F, LAY	
2414	Transition	CISCO-FINJAN-YS_00001972.001	CISCO-FINJAN-YS_00001972.003	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2415	01.10.2005 Finjan presentation titled "Board Meeting - General"; January 10, 2005 Board Presentation	CISCO-FINJAN-YS_00001997.001	CISCO-FINJAN-YS_00001997.118	Cisco/Finjan relationship, Finjan background, operations and technology	Klausner, Cole, Samet, Polani	H, 602, 611, 702	NH, F, LAY	
2416	01.03.2006 fax letter from Sally Gills to Yuval Ben Izhak regarding patent enforcement project	CISCO-FINJAN-YS_00002036.001	CISCO-FINJAN-YS_00002036.004	Finjan background, operations, technology	Samet, Touboul, Chinn, Ben-Izhak, Polani	H, 602, 611	NH, F	
2417	Finjan financial statements for 2004 and 2005	CISCO-FINJAN-YS_00002082.001	CISCO-FINJAN-YS_00002082.001	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2418	Financial statements - final	CISCO-FINJAN-YS_00002083.001	CISCO-FINJAN-YS_00002083.020	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2419	Financial statements 2005-Draft	CISCO-FINJAN-YS_00002084.001	CISCO-FINJAN-YS_00002084.021	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2420	FinjanTransitionStatus-SnapShot(Mar.18h2006)-Confidential	CISCO-FINJAN-YS_00002236.001	CISCO-FINJAN-YS_00002236.004	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2421	4.11.2006 email from Asher Polani regarding Yahoo! France story	CISCO-FINJAN-YS_00002256.001	CISCO-FINJAN-YS_00002256.002	Finjan background, operations, technology	Cole, Samet, Touboul, Chinn, Ben-Izhak, Polani	H, 401-403, 602, 611	NH, REL, F	
2422	Background Material for the board	CISCO-FINJAN-YS_00002263.001	CISCO-FINJAN-YS_00002263.001	Finjan background, operations, technology	Samet, Polani	H, 602, 611	NH, F	
2423	Finjan Board Meeting (Apr. 26, 2006)	CISCO-FINJAN-YS_00002264.001	CISCO-FINJAN-YS_00002264.096	Finjan background, operations, technology	Samet, Polani	H, 602, 611	NH, F	
2424	(2006) - Finjan PPT with claim chart analysis	CISCO-FINJAN-YS_00002347.001	CISCO-FINJAN-YS_00002347.015	Finjan background, operations, technology	Samet, Chinn, Touboul, Polani	H, 602, 611	NH, F	
2425	8.8.2006 email from Asher Polani regarding a confidential Finjan monthly status report (July 31, 2006)	CISCO-FINJAN-YS_00002500.001	CISCO-FINJAN-YS_00002500.009	Finjan background, operations, technology	Cole, Samet, Touboul, Chinn, Ben-Izhak, Polani	H, 401-403, 602, 611	NH, REL, F	
2426	Cisco VPN server/client	CISCO-FINJAN-YS_00002630.001	CISCO-FINJAN-YS_00002630.001	Finjan background, operations, technology	Samet, Touboul	H, 602, 611	NH, F	
2427	Yoggie	CISCO-FINJAN-YS_00002689.001	CISCO-FINJAN-YS_00002689.001	Finjan background, operations, technology	Samet, Touboul	H, 401-403, 602, 611	NH, REL, F	
2428	Yoggie	CISCO-FINJAN-YS_00002690.001	CISCO-FINJAN-YS_00002690.022	Finjan background, operations, technology	Touboul, Samet	H, 401-403, 611	NH, REL	
2429	Yoggie	CISCO-FINJAN-YS_00002691.001	CISCO-FINJAN-YS_00002691.005	Finjan background, operations, technology	Touboul, Samet	H, 401-403, 611	NH, REL	
2430	July 9, 2007 Finjan Board Meeting PowerPoint	CISCO-FINJAN-YS_00003019.001	CISCO-FINJAN-YS_00003019.061	Finjan background, operations, technology	Samet, Chinn, Polani	H, 602, 611	NH, F	
2431	01.31.2008 email from Yuval Ben-Izhak regarding catch up on IPR status	CISCO-FINJAN-YS_00003331.001	CISCO-FINJAN-YS_00003331.015	Finjan background, operations, technology	Samet, Touboul, Chinn, Ben-Izhak, Polani	H, 602, 611	NH, F	
2432	RE: Finjan BD Intro.htm	CISCO-FINJAN-YS_00003435	CISCO-FINJAN-YS_00003435	Cisco/Finjan relationship, Finjan background, operations and technology	Klausner, Samet, Valory	H, 611, 702	NH, REL, LAY	
2433	RE: Touch Base.htm	CISCO-FINJAN-YS_00003567.001	CISCO-FINJAN-YS_00003567.001	Finjan background, operations, technology	Samet, Touboul	H, 602, 611	NH, F	
2434	(2008) - Finjan board call agenda	CISCO-FINJAN-YS_00003592.001	CISCO-FINJAN-YS_00003592.002	Finjan background, operations, technology	Samet, Chinn	H, 611	NH, REL	
2435	RE: Catch up Yoav/Shomo.htm	CISCO-FINJAN-YS_00003617.001	CISCO-FINJAN-YS_00003617.001	Finjan background, operations, technology	Samet, Touboul	H, 611	NH, REL	
2436	Finjan June 24, 2008 Board Pack from John Vigoroux	CISCO-FINJAN-YS_00003656.001	CISCO-FINJAN-YS_00003656.002	Finjan background, operations, technology	Samet, Chinn	H, 611	NH, REL	

Appendix C-3
Finjan, Inc. v. Cisco Systems, Inc.
No. 5:17-cv-00072-BLF (N.D. Cal.)
Defendant Cisco Systems, Inc.'s Exhibit List

Exhibit #	Description	Begin Dates	End Dates	Purpose	Sponsoring Witness	Objections	Response to Objections	Court Use
2706	08.05.2014 email from Ivan Chaperot regarding security patent landscape	FINJAN-CISCO 623513	FINJAN-CISCO 863524	Finjan background, operations, technology	Chaperot, Harstein	H. 401-403; 602, 611	REL. F. LAY. IMPOBJ. NH	
2707	04/14/2015 email from Phil Harstein regarding contacts and licensing deal with F-Secure	FINJAN-CISCO 629868	FINJAN-CISCO 620969	License Agreement/Damages, Cisco/Finjan relationships	Harstein, Ben-Izhak	H. 401-403; 611	REL. F. LAY. IMPOBJ. NH	
2708	12/28/2015 Moore email to Harstein re: Mark Chandler	FINJAN-CISCO 630208	FINJAN-CISCO 630208	Finjan background, operations, technology	Garland, Mar-Spinoia, Harstein, Moore	H. 401-403; 602, 611	REL. F. LAY. IMPOBJ. NH	
2709	01/09/2017 Noonan email to McFree, Harstein re: Finjan demand from Cisco	FINJAN-CISCO 630847	FINJAN-CISCO 630849	Finjan background, operations, technology	Garland, Mar-Spinoia, Harstein, Noonan	H. 401-403; 602, 611	REL. F. LAY. IMPOBJ. NH	
2710	Email: Cisco (non) update	FINJAN-CISCO 631369	FINJAN-CISCO 631369	Finjan background, operations, technology	Chinn, Harstein	H. 401-403; 602, 611	REL. F. LAY. IMPOBJ. NH	
2711	06.01.2008 Yuval Ben-Izhak article titled "The Cybercrime 2.0 Evolution." ISSA Journal	FINJAN-CISCO 632073	FINJAN-CISCO 632076	Finjan background, operations, technology	Chinn, Ben-Izhak, Polani	H. 401-403; 602, 611	REL. F. LAY. IMPOBJ. NH	
2712	03.21.2012 email from Shomo Touboul to Daniel Chinn concerning Mobile and Wireless Security Report	FINJAN-CISCO 632144	FINJAN-CISCO 632144	Finjan background, operations, technology	Touboul, Chinn	H. 401-403; 611	REL. F. LAY. IMPOBJ. NH	
2713	Mobile and Wireless Security Report by Shomo Touboul (2013)	FINJAN-CISCO 632145	FINJAN-CISCO 632203	Finjan background, operations, technology	Touboul, Chinn	H. 401-403; 611	REL. F. LAY. IMPOBJ. NH	
2714	04.08.2013 email from Shomo Touboul regarding the new M&A transaction	FINJAN-CISCO 632334	FINJAN-CISCO 632338	Finjan background, operations, technology	Touboul, Chinn	H. 401-403; 611	REL. F. LAY. IMPOBJ. NH	
2715	10.19.2015 email from Daniel Chinn regarding Finjan Holdings board	FINJAN-CISCO 634229	FINJAN-CISCO 634230	Finjan background, operations, technology	Chinn, Moore, Harstein	H. 401-403; 602, 611	REL. F. LAY. IMPOBJ. NH	
2716	04/23/2013 email from Daniel Chinn regarding first run of materials from Vered	FINJAN-CISCO 634424	FINJAN-CISCO 634425	Finjan background, operations, technology	Touboul, Chinn, Harstein	H. 401-403; 611	REL. F. LAY. IMPOBJ. NH	
2717	Email re: Trustwave royalty model	FINJAN-CISCO 634608	FINJAN-CISCO 634611	Finjan background, operations, technology	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. EXPERT. LAY. IMPOBJ. NH, OPP	
2718	2018 - Dawson James initiation report on FINJAN	FINJAN-CISCO 634713	FINJAN-CISCO 634713	Finjan background, operations, technology	Chinn, Garland, Mar-Spinoia, Harstein	H. 401-403; 602, 611, 901	REL. F. LAY. IMPOBJ. NH, AUTH	
2719	Dawson James Equity Research (May 2018)	FINJAN-CISCO 634714	FINJAN-CISCO 634728	Finjan background, operations, technology	Chinn, Garland, Mar-Spinoia, Harstein	H. 401-403; 602, 611, 901	REL. F. LAY. IMPOBJ. NH	
2720	09.30.2013 email from Daniel Chinn regarding Cisco, quarterly review	FINJAN-CISCO 634884	FINJAN-CISCO 634885	Finjan background, operations, technology	Samet, Chinn	H. 611	REL. F. LAY. IMPOBJ. NH	
2721	04/02/2013 Harstein email to Chinn re: Touboul, IPNav	FINJAN-CISCO 635180	FINJAN-CISCO 635180	Finjan background, operations, technology	Harstein, Chinn, Touboul	H. 401-403; 602, 611	REL. F. LAY. IMPOBJ. NH	
2722	Third party license discussions (Apr 2015)	FINJAN-CISCO 635220	FINJAN-CISCO 635220	Finjan background, operations, technology	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	NH, REL. EXPERT. LAY. F, OPP	
2723	Third party license discussions (April 2015)	FINJAN-CISCO 635221	FINJAN-CISCO 635234	Damages	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	NH, REL. EXPERT. LAY. F, OPP	
2724	Third party Finjan license discussions	FINJAN-CISCO 635274	FINJAN-CISCO 635287	Damages	Becker, Garland, Mar-Spinoia	H. 401-403; 611	REL. F. LAY. IMPOBJ. NH	
2725	Email re: Harstein short bio for website	FINJAN-CISCO 638443	FINJAN-CISCO 638444	Finjan background, operations, technology	Harstein	H. 401-403; 611	REL. F. LAY. IMPOBJ. NH	
2726	Finjan Investor fact sheet (Oct 2013)	FINJAN-CISCO 638445	FINJAN-CISCO 638446	Finjan background, operations, technology	Garland, Mar-Spinoia, Harstein	H. 401-403; 602, 611	REL. F. LAY. IMPOBJ. NH	
2727	04.04.2013 email from Shomo Touboul regarding proposal to CUPP	FINJAN-CISCO 638929	FINJAN-CISCO 638933	Finjan background, operations, technology	Touboul, Chinn, Harstein	H. 401-403; 611	REL. F. LAY. IMPOBJ. NH	
2728	2013 Investor presentation	FINJAN-CISCO 640154	FINJAN-CISCO 640175	Finjan background, operations, technology	Garland, Mar-Spinoia, Harstein	H. 401-403; 602, 611	REL. F. LAY. IMPOBJ. NH	
2729	Harstein forwards Touboul report to Shimon Steinmetz	FINJAN-CISCO 641208	FINJAN-CISCO 641210	Finjan background, operations, technology	Garland, Mar-Spinoia, Harstein, Chinn, Touboul	H. 401-403; 602, 611	REL. F. LAY. IMPOBJ. NH	
2730	Attachment to Harstein email to Shimon Steinmetz	FINJAN-CISCO 641211	FINJAN-CISCO 641269	Finjan background, operations, technology	Garland, Mar-Spinoia, Harstein, Chinn, Touboul	H. 401-403; 602, 611	REL. F. LAY. IMPOBJ. NH	
2731	05.28.2014 email from Julie Mar-Spinoia regarding Finjan v. Bluescoat	FINJAN-CISCO 641317	FINJAN-CISCO 641327	Damages	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. EXPERT, IMPOBJ. OPP. NH	
2732	Redline version of Blue Coat's and Finjan's preliminary settlement terms	FINJAN-CISCO 641328	FINJAN-CISCO 641332	Finjan background, operations, technology	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. EXPERT, IMPOBJ. OPP. NH	
2733	Deposition Transcript (Juniper Ltd) - Garland John 2018-11-02	FINJAN-CISCO 642890	FINJAN-CISCO 643080	Finjan background, operations, technology	Garland	H. 401-403; 611	REL. F. LAY. IMPOBJ. NH	
2734	FireEye - Discussing excluded entities list and impact on license	FINJAN-CISCO 644364	FINJAN-CISCO 644376	Finjan background, operations, technology	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. EXPERT, IMPOBJ. OPP. NH	
2735	03.26.2015 handwritten notes from conference call	FINJAN-CISCO 646086	FINJAN-CISCO 646086	Finjan background, operations, technology	Chaperot, Harstein	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. IMPOBJ. OPP, BEST. NH	
2736	04.27.2016 Finjan Licensing Term Sheet for possible acquisition of Third Party	FINJAN-CISCO 656844	FINJAN-CISCO 656847	Damages	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. EXPERT, IMPOBJ. OPP. NH	
2737	01.08.2017 email from Julie Mar-Spinoia regarding settlement discussions between Sophos and Finjan	FINJAN-CISCO 661365	FINJAN-CISCO 661372	Finjan background, operations, technology	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. EXPERT, IMPOBJ. OPP. NH	
2738	09.10.2015 email from John Garland regarding Finjan/Third party	FINJAN-CISCO 671351	FINJAN-CISCO 671352	Finjan background, operations, technology	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. EXPERT, IMPOBJ. OPP. NH	
2739	08.27.2015 Finjan presentation titled "Patent Licensing Discussions" with Third party	FINJAN-CISCO 671353	FINJAN-CISCO 671392	Damages	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. EXPERT, IMPOBJ. OPP. NH	
2740	08.15.2016 email from John Garland regarding F5 Networks licensing discussions	FINJAN-CISCO 675433	FINJAN-CISCO 675435	Damages	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. EXPERT, IMPOBJ. OPP. NH	
2741	08.15.2016 Finjan presentation titled "Patent Licensing Discussions" with F5 Networks	FINJAN-CISCO 675436	FINJAN-CISCO 675451	Damages	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. EXPERT, IMPOBJ. OPP. NH	
2742	08.15.2016 Finjan presentation titled "Patent Licensing Discussions" with F5	FINJAN-CISCO 679603	FINJAN-CISCO 679636	Damages	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. EXPERT, IMPOBJ. OPP. NH	
2743	08/13/2016 email from John Garland regarding F5 Networks licensing discussions	FINJAN-CISCO 680445	FINJAN-CISCO 680453	Damages	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. EXPERT, IMPOBJ. OPP. NH	
2744	04.08.2016 Finjan presentation titled "Patent Licensing Discussions" with F5	FINJAN-CISCO 680454	FINJAN-CISCO 680498	Damages	Becker, Garland, Mar-Spinoia	H. 401-403; 602, 611, 702, EXC	REL. F. LAY. EXPERT, IMPOBJ. OPP. NH	